

In Re . . .)	Criminal No. 1:21-CR-378 (LEK)
UNITED STATES OF AMERICA)	
)	Government’s Sealing Application
v.)	
)	Filed Under Seal
JESSE BEDELL)	
)	
)	

The United States respectfully requests such sealing because public filing of the above-described documents may *[indicate all reasons that apply]*:

<input checked="" type="checkbox"/>	Jeopardize an ongoing federal criminal investigation by revealing the existence of that investigation to potential targets and subjects of the investigation;
<input type="checkbox"/>	Jeopardize the safety of a person who has provided information and/or other assistance to the criminal investigation or the family and/or friends of such person by revealing such person's cooperation with the investigation to those under investigation or their associates;
<input type="checkbox"/>	Jeopardize the safety of law enforcement personnel;
<input type="checkbox"/>	Reveal law enforcement methods, techniques, and/or procedures, thereby jeopardizing future investigations using such methods, techniques, and/or procedures;
<input type="checkbox"/>	Reveal non-public information about one or more victims and/or witnesses and such information could lead to adverse financial and/or social consequences for such person(s);
<input type="checkbox"/>	Reveal non-public information about one or more targets or subjects of the investigation who have not been charged with a crime in the relevant investigation and such information could lead to adverse financial and/or social consequences for such person(s);
<input type="checkbox"/>	Reveal matters in violation of federal law, such as Rule 6(e) of the Federal Rules of Criminal Procedure and/or Title 26, United States Code, Section 6103;
<input type="checkbox"/>	Jeopardize national security.

Along with the above-described documents, the government is filing a redacted version of the proposed sealing order, one that has the words “filed under seal” replaced with the words “for public filing” and has the case caption redacted. The government has no objection to the public filing of this version of the proposed sealing order.

The government further requests the following:

- 1) That the government be permitted to disclose the sealed documents to appropriate law enforcement officials; and
- 2) That the Court order that the above-described documents remain under seal until further order of this Court or any court of competent jurisdiction, except that if the document(s) filed under seal relate solely to a government request for an arrest warrant, that such documents and the warrant be unsealed upon the arrest of the person to be arrested.

If this Court determines that the above-described document(s) should not be filed under seal, the government requests that the Court return the document(s) to the government without filing them publicly.

Dated: October 27, 2021

CARLA B. FREEDMAN
United States Attorney

By: /s Jeffrey Stitt
Jeffrey Stitt
Assistant United States Attorney
Bar Roll No. 520195